

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

1) CHRISTY BAILEY, Personal
Representative of the Estate
Of Jeffrey Peterson,

Plaintiff,

vs.

(1) CITY OF ADA,
(2) OFFICER MARCUS BEALE
(3) OFFICER JUSSELY CANADA
(4) OFFICER MICHAEL MEEKS
(5) OFFICER PHILLIP VOGT

Defendants.

Case No. 20-CV-327-SPS

DEFENDANT MARCUS BEALE'S WITNESS LIST

The following witnesses are expected to be called at the time of trial:

No.	Witness	Expected Testimony
1.	Christy Bailey, Plaintiff c/o Jack Mattingly	Plaintiff is expected to testify regarding the allegations contained in her Complaint.
2.	Officer Marcus Beale Ada Police Department c/o Scott Wood	He is expected to testify about the incident of September 21, 2019, his police training on use of force, including deadly force, arrest, and his past experience in dealing with domestic disputes, and all allegations contained in Plaintiff's Complaint.
3.	Officer Michael Meeks Ada Police Department c/o Sean McKelvey	He is expected to testify about the incident of September 21, 2019, his police training on use of force, including deadly force, arrest, and his past experience in dealing with domestic disputes, authenticate his body worn camera recording, and all allegations contained in Plaintiff's Complaint.
4.	Officer Jussely Canada Ada Police Department c/o Sean McKelvey	She is expected to testify about the incident of September 21, 2019, her police training on use of force, including deadly force, arrest, and his past experience in dealing with domestic disputes, authenticate his body worn

		camera recording, and all allegations contained in Plaintiff's Complaint.
5.	Officer Phillip Vogt Ada Police Department c/o Sean McKelvey	He is expected to testify about the incident of September 21, 2019, and all allegations contained in Plaintiff's Complaint.
6.	James Gastineau Ada Police Department c/o Scott Wood	Sergeant at Ada PD and supervisor on duty at time of incident on September 21, 2019. Will testify regarding his response to the scene and his role in the investigation.
7.	Megan Timmons 1100 S. Highland Ave, # 9c Ada, Ok. 74820	Reporting party who called the police; Will testify regarding the incident of September 21, 2019, and the events leading up to her 911 call to the Ada Police Department. She will also testify about kicking in the door to Peterson's apartment on previous occasions, and the condition of the door at the time of the shooting incident.
8.	OSBI Agent Justin Brown South Central Office 1130 E. Main St. Tishimingo, Ok. 73460	He is expected to testify about the incident of September 21, 2019, and his investigation regarding same.
9.	OSBI Agent David Gatlin South Central Office 1130 E. Main St. Tishimingo, Ok. 73460	He is expected to testify about the incident of September 21, 2019, and his role in the investigation regarding same.
10.	OSBI Agent Heath Miller South Central Office 1130 E. Main St. Tishimingo, Ok. 73460	He is expected to testify about the incident of September 21, 2019, and his role in the investigation regarding same.
11.	OSBI Agent Bill Hedrick South Central Office 1130 E. Main St. Tishimingo, Ok. 73460	He is expected to testify about the incident of September 21, 2019, and his role in the investigation regarding same, including documentation of the scene of the shooting.
12.	Captain Michael Lynch Ada Police Department Ada, Ok.	He is expected to testify about his memo of September 5, 2019, documenting Marcus Beale's body worn camera was not functioning properly and needed to be repaired.
13.	Joseb Youngwolfe Address unknown	Defendant expects Mr. Youngwolfe to testify regarding Peterson's demeanor in the early morning hours of September 21, 2019, and his mental status during that time prior to the shooting.
14.	David Bolinger Address unknown	Defendant expects Mr. Bolinger to testify regarding Peterson's demeanor in the early morning hours of September 21, 2019, and his mental status during that time prior to the shooting.
15.	Police Practices Expert Witness to be named.	Will testify regarding the actions of Defendant officers on September 21, 2019, their training and experience, and the uses of force by each.

17.	Medical Examiner	Will testify regarding the autopsy on Peterson, the cause of death, and the toxicology test results.
17.	All witnesses endorsed by the Plaintiff and co-defendants, not objected to by this Defendant.	
18.	Additional witnesses that have not yet been identified.	

Respectfully submitted,

/s/ Scott B. Wood
 Scott B. Wood, OBA 12536
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Attorneys for Marcus Beale

CERTIFICATE OF SERVICE

This is to certify that on October 29, 2021, I electronically transmitted the foregoing document to the following ECF registrants:

Jack Mattingly Jr.
 Jeanette Samuels
 Jarrett Adams
 Sean McKelvey

/s/ Scott B. Wood